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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
 PRISONERS et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA
 FEDERAL BUREAU OF PRISONS et al.,

Defendants.

Case No. 4:23-cv-04155-YGR

**DECLARATION OF SUSAN M. BEATY
 IN SUPPORT OF PLAINTIFFS’
 ADMINISTRATIVE MOTION
 PURSUANT TO CIVIL L.R. 7-11 FOR
 INCREASED ATTORNEY VISITATION
 BEFORE THE JANUARY 3
 EVIDENTIARY HEARING**

1 I, Susan M. Beaty, hereby declare as follows:

2 1. I am an attorney admitted to practice law in the State of California (SBN 324048). I
3 am a Senior Attorney at the California Collaborative For Immigrant Justice and counsel for Plaintiffs
4 in the above captioned matter.

5 2. I submit this declaration in support of Plaintiffs' Administrative Motion For Increased
6 Attorney Visitation Before The January 3 Evidentiary Hearing. I have personal knowledge of the
7 facts stated herein and, if called as a witness, could and would testify competently thereto.

8 3. Attached hereto as Exhibit 1 is a true and correct copy of an email chain between
9 Plaintiffs' counsel and FCI Dublin, dated December 21-23, 2023.

10 4. Attached hereto as Exhibit 2 is a true and correct copy of an email chain between
11 myself and Defendants' counsel, dated December 23-28, 2023.

12 5. Attached hereto as Exhibit 3 is a true and correct copy of an email between Plaintiffs
13 counsel and Defendants' counsel, dated December 15, 2023.

14 6. On December 27, 2023, Government counsel informed Plaintiffs' counsel that the
15 Government would be adding five unidentified FCI Dublin inmates to its witness list but declined to
16 name the actual individuals until December 29, 2023, at the earliest.

17
18 Dated: December 28, 2023

Respectfully submitted,

19
20 By: /s/ Susan M. Beaty

21 Susan M. Beaty

22 **RIGHTS BEHIND BARS**

23 **CALIFORNIA COLLABORATIVE FOR**
IMMIGRANT JUSTICE

24 **ROSEN BIEN GALVAN & GRUNFELD LLP**
ARNOLD & PORTER KAYE SCHOLER LLP

25 *Attorneys for Plaintiffs*
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